

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:

CHRISTOPHER S. MEHAFFIE	\$	CASE NO. 09-31689-H4-13
	\$	
	\$	
	\$	
DEBTOR	\$	

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APPLEWAY EQUIPMENT LEASING, INC.	\$	
Plaintiff	\$	
	\$	
	\$	ADV. NO. 09-3230
VS.	\$	
	\$	
CHRISOPHTER S. MEHAFFIE	\$	
	\$	
	\$	
Defendant	\$	

ANSWER TO COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT  
UNDER 11 U.S.C. SECTION 523 AND FOR DAMAGES

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, CHRISTOPHER S. MEHAFFIE, Defendant herein, and files his Answer to the Complaint filed by Appleway Equipment Leasing, Inc., Plaintiff herein, Objecting to Dischargeability of Debt Under 11 U.S.C. Section 523 and Damages, and would respectfully show unto the Court as follows:

1. The last sentence in paragraph 1 is a request for relief, and no answer is necessary. To the extent an answer is required, Defendant denies the relief requested therein. In response to the remaining allegations set forth in paragraph 1 of

the Complaint, Defendant is without information sufficient to admit or deny, or assert a privilege as to the allegations contained therein because Plaintiff has failed to attach the documents referenced therein. Until the referenced documents are provided, Defendant reserves his right to amend or supplement his answer.

2. Defendant admits that the Court has jurisdiction, that this is a core proceeding, and venue is proper as set forth in paragraph 2 of the Complaint.

3. Subject to Court determination pertaining to the pending Objection to Claim and the Complaint, Defendant denies that Plaintiff is a creditor and party in interest as set forth in paragraph 3 of the Complaint.

4. Defendant admits the allegations set forth in paragraph 4 of the Complaint.

5. Defendant admits the allegations contained in the first, and third sentences of paragraph 5 of the Complaint. Defendant admits that Plaintiff sued Defendant at the time the case was filed but denies the remaining allegations in the second sentence. No response is necessary to the matters set forth in the fourth sentence because it is a request for relief. To the extent an answer is deemed necessary, Defendant would deny those matters.

6. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny, or assert a privilege as to the allegations contained in paragraph 6 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

7. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny, or to assert a privilege as to the allegations contained in paragraph 7 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

8. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny, or assert a privilege as to the allegations contained in the first sentence of paragraph 8 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny the allegations contained in the second and third sentences of paragraph 8 of the Complaint.

9. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 9 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

10. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny the allegations contained in the first sentence of paragraph 10 of the Complaint. Defendant denies the remaining allegations contained in paragraph 10.

11. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny the allegations contained in the first sentence of paragraph 11 of the Complaint to the extent the allegations pertain to D & L, its principals, Don Mehaffie, and Larry Marsh. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 11 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

12. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 12 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

13. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 13 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

14. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 14 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

15. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny the allegations contained in paragraph 15 of the Complaint.

16. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 16 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

17. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 17 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

18. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 18 of the Complaint.

19. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 19 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

20. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 20 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

21. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 21 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

22. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 22 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

23. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 23 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

24. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 24 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

25. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 25 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

26. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 26 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

27. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 27 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

28. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 28 of the



Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

29. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 29 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

30. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 30 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

31. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 31 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

32. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 32 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

33. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 33 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

34. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 34 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

35. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 35 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

36. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 36 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

37. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 37 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

38. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 38 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

39. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 39 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

40. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 40 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

41. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 41 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

42 Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 42 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

43. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 43 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

44. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 44 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

45. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 45 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

46. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny the allegations contained in paragraph 46 of the Complaint to the extent the allegations pertain to the referenced contract being worthless and the collateral missing or of little value. Defendant is

without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the remaining allegations contained in paragraph 46 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

47. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 47 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

48. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 48 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

49. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 49 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or

supplement his answer.

50. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 50 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

51. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 51 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

52. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 52 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

53. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 53 of the Complaint. Plaintiff has failed to attach the documents

referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

54. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 54 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

55. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 55 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

56. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 56 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

57. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a



privilege as to the allegations contained in paragraph 57 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

58. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 58 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

59. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 59 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

60. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 60 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

61. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 61 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

62. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 62 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

63. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 63 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

64. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 64 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

65. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 65 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

66. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 66 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

67. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 67 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

68. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 68 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

69. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 69 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

70. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 70 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

71. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 71 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

72. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 72 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

73. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 73 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

74. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 74 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

75. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 75 of the Complaint. Plaintiff has failed to attach the documents

referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

76. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 76 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

77. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 77 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

78. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 78 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

79. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a

privilege as to the allegations contained in paragraph 79 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

80. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 80 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

81. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 81 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

82. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 82 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

83. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 83 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

84. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 84 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

85. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 85 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

86. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 86 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents



referenced therein, Defendant reserves his right to amend or supplement his answer.

87. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 87 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

88. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 88 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

89. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 89 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

90. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 90 of the

Complaint.

91. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 91 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

92. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 92 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

93. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 93 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

94. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 94 of the Complaint. Plaintiff has failed to attach the documents

referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

95. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 95 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

96. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 96 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

97. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 97 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

98. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a

privilege as to the allegations contained in paragraph 98 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

99. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 99 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

100. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 100 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

101. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 101 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

102. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 102 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

103. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 103 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

104. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 104 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

105. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 105 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

106. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 106 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

107. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 107 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

108. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 108 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

109. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 109 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

110. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 110 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

111. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 111 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

112. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 112 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

113. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 113 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

114. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 114 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

115. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 115 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

116. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 116 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents



referenced therein, Defendant reserves his right to amend or supplement his answer.

117. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 117 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

118. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 118 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

119. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 119 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

120. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 120 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

121. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 121 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

122. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 122 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

123. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 123 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

124. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 124 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

125. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 125 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

126. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 126 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

127. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 127 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

128. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 128 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

129. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 129 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

130. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 130 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

131. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 131 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

132. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 132 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

133. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 133 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

134. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 134 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

135. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 135 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

136. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 136 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

137. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 137 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

138. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 138 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

139. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 139 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

140. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 140 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

141. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 141 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

142. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 142 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

143. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 143 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

144. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 144 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

145. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 145 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.



146. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 146 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

147. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 147 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

148. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 148 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

149. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 149 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

150. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 150 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

151. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 151 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

152. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 152 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

153. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 153 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

154. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 154 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

155. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 155 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

156. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 156 of the Complaint.

157. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 157 of the Complaint. Plaintiff has failed to attach the documents

referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

158. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 158 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

159. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 159 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

160. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 160 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

161. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a

privilege as to the allegations contained in paragraph 161 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

162. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 162 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

163. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or to assert a privilege as to the allegations contained in paragraph 163 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

164. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 164 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

165. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 165 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

166. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 166 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

167. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 167 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

168. Defendant denies the allegations contained in paragraph 168 of the Complaint.

169. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 169 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

170. Defendant denies the allegations contained in paragraph 170 of the Complaint.

171. Defendant denies the allegations contained in the first, third, fourth, and fifth sentences of paragraph 171 of the Complaint. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in the second sentence of paragraph 171 except Defendant denies the allegations pertaining to a partnership. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

172. Defendant denies the allegations contained in the first, second, and seventh sentences of paragraph 172 of the Complaint. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in the third, fourth, fifth, and sixth sentences of paragraph 172. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

173. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 173 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

174. Defendant denies the allegations contained in the first sentence of paragraph 174 of the Complaint. Defendant denies that D & L was his partner as set forth in the second sentence. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 174 of the Complaint. Plaintiff has failed to attach the documents referenced therein to support its allegations and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

175. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 175 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.



176. Defendant denies the allegations contained in paragraph 176 of the Complaint.

177. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 177 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

178. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 178 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

179. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 179 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

180. Defendant denies the allegations contained in paragraph 180 of the Complaint to the extent they pertain to a

D & L Conspiracy. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 180 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

181. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 181 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

182. Defendant denies the allegations contained in paragraph 182 of the Complaint to the extent they pertain to a D & L Conspiracy. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 182 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

183. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 183.

184. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 184 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

186. Defendant denies that D & L is his alter-ego/partner as set forth in paragraph 186. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 186. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

187. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 187 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

188. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 188 of the Complaint. Plaintiff has failed to attach the documents

referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

189. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 189 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

190. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 190 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

191. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 191 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

192. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a

privilege as to the allegations contained in paragraph 192 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

193. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 193 of the Complaint. Plaintiff has failed to attach the documents in support of its allegations and until Plaintiff provides the documents, Defendant reserves his right to amend or supplement his answer.

194. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 194 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

195. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 195 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

196. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 196 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

197. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 197 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

198. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 198 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

199. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 199 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

200. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 200 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

201. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 201 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

202. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 202 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

203. Defendant denies the allegations contained in paragraph 203 of the Complaint.

204. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 204 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

205. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 205 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

206. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 206 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

207. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 207 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents



referenced therein, Defendant reserves his right to amend or supplement his answer.

208. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 208 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

209. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 209 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

210. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 210 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

211. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 211 of the

Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

212. Defendant denies that he has partners and alter-egos as set forth in the first sentence of paragraph 212 of the Complaint. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 212 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

213. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 213 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

214. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 214 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or

supplement his answer.

215. Paragraph 215 restates all prior allegations. As such, no answer is required. To the extent an answer is required, Defendant incorporates the answers to the preceding paragraphs.

216. Defendant denies the allegations contained in paragraph 216 of the Complaint to the extent they pertain to alter-ego and a partnership with D & L. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the remaining allegations contained in paragraph 216 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

217. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 217 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

218. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 218 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents

referenced therein, Defendant reserves his right to amend or supplement his answer.

219. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 219 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

220. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 220 of the Complaint. Plaintiff has failed to attach the documents referenced therein and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

221. Defendant is without information sufficient to form a belief as to the truth of or to admit or deny or assert a privilege as to the allegations contained in paragraph 221 of the Complaint. Plaintiff has failed to attach the documents referenced therein in support of its allegations and until Plaintiff provides the documents referenced therein, Defendant reserves his right to amend or supplement his answer.

222. Defendant denies the allegations contained in paragraph 222 of the Complaint.

223. Defendant denies the allegations contained in paragraph 223 of the Complaint.

AFFIRMATIVE DEFENSES

224. Subject to the foregoing responses, Defendant pleads the affirmative defenses of assumption of risk and acquiescence.

WHEREFORE, PREMISES CONSIDERED, Christopher S. Mehaffie, Defendant herein, prays that the relief requested by Plaintiff be denied, and that he be entitled to such other and further relief, at law or in equity, as is just.

Respectfully submitted this 24th day of July, 2009.

/s/ Karen R. Emmott

KAREN R. EMMOTT  
SBN 16757900  
Admissions No. 2000  
4615 SW Frwy., Suite 500  
Houston, TX 77027  
Tel: (713) 739-0008  
Fax: (713) 481-6262  
Attorney for Defendant

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Answer has been sent to the below listed party via first class mail, postage prepaid, unless otherwise served by the CM-ECF system on July 24, 2009.

Attorney for Appleway Equipment Leasing, Inc.  
Hugh M. Ray, III  
Weycer, Kaplan, Pulaski & Zuber, PC  
Eleven Greenway Plaza, Ste 1400  
Houston, TX 77046

/s/ Karen R. Emmott  
KAREN R. EMMOTT

